

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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JANE DOE NO. 1, JANE DOE NO. 2, and  
JANE DOE NO. 3,

Plaintiffs,

v.

BACKPAGE.COM, LLC, CARL  
FERRER, MICHAEL LACEY, and  
JAMES LARKIN,

Defendants.

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Docket No. C.A. 17-cv-11069-LTS

**MOTION TO WITHDRAW OF PRINCE LOBEL TYE LLP**

Pursuant to Local Rule 83.5.2, the undersigned counsel, Robert A. Bertsche and Jeffrey J. Pyle of the firm Prince Lobel Tye LLP (“Prince Lobel”), hereby move to withdraw as counsel of record for all defendants. Prince Lobel is withdrawing from this representation based on professional considerations, and because of recent events and communications from Carl Ferrer, CEO of Backpage.com LLC. A copy of one such communication was filed with this Court on April 27, 2018. (Doc. No. 65). As a result of the foregoing, the undersigned have determined that valid grounds exist such that they can no longer represent the defendants in this action.

Prince Lobel has notified Backpage.com, LLC and Carl Ferrer, in writing, through independent counsel for Mr. Ferrer, of their intent to withdraw from this representation. The undersigned understand that Mr. Ferrer and Backpage.com, LLC may be contacted through Nanci L. Clarence, Clarence Dyer & Cohen LLP, 899 Ellis Street, San Francisco, CA 94109 (415-749-1800). Prince Lobel has also so notified counsel for Michael Lacey and James Larkin. The undersigned will serve a copy of this submission on all defendants concurrently with its filing.

Wherefore, for the reasons stated above, the undersigned attorneys respectfully request that they be granted leave to withdraw as counsel herein.

Respectfully submitted,

/s/ Robert A. Bertsche  
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Dated: May 4, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that the within document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and by first-class mail to any non-registered participants.

/s/ Jeffrey J. Pyle  
Jeffrey J. Pyle